

IN THE
FIRST COURT OF APPEALS
OF TEXAS

FILED IN
1st COURT OF APPEALS
HOUSTON, TEXAS

3/26/2020 8:04:25 AM

LAKESIA BRENT	§	CHRISTOPHER A. PRINE Clerk
	§	
VS.	§	CAUSE NO. 01-19-01008-CR
	§	
THE STATE OF TEXAS	§	

First Motion to Extend Time to File Brief

Comes now LAKESIA BRENT, appellant in this cause, through Assistant Public Defender, Miranda Meador, and respectfully requests additional time to prepare the brief, and for cause would show the Court as follows:

I.

Ms. Brent was convicted March 4, 2016, of Theft. She was sentenced to 180 days in jail, which was suspended, and she was placed on probation for one year. On November 1, 2019, Ms. Brent filed a Motion to Set Aside Verdict and Dismiss, which was granted on November 19, 2019. The State filed Notice of Appeal on December 3, 2019, and filed its brief on February 25, 2020.

II.

Appellee's brief is currently due March 26, 2020. No previous extensions of time have been requested. Counsel is requesting thirty days until April 26, 2020.

III.

Undersigned counsel's reasons for the request are:

- Counsel is also working on brief in *JB Black v. State of Texas*, *Jeffrey Wofford v. State of Texas*, and *Watts v. State of Texas*.
- Counsel was absent from work due to recent, unexpected school closures.

IV.

This request is made not to delay the proceedings, but to ensure that Ms. Brent is appropriately represented.

WHEREFORE, PREMISES CONSIDERED, Ms. Brent respectfully prays this motion be granted and an additional time be given.

Respectfully submitted,

Alexander Bunin
Chief Public Defender

/s/ Miranda Meador
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CERTIFICATE OF SERVICE

Pursuant to Tex. R. App. Proc. 9.5, this certifies that on March 26, 2020, a copy of the foregoing was emailed to counsel for the state (through texfile.com) at the following address:

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/s/ Miranda Meador

MIRANDA MEADOR

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